

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

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JUDEKENNETH MADUKA ORJI, :
: Plaintiff, : Civil Action No. 23-cv-02986-LKG
: v. :
CITADEL SECURITIES, LLC, *et al.*, :
: Defendants. :
.....
x

**MARKET MAKER DEFENDANTS'
MOTION TO DISMISS THE SECOND AMENDED COMPLAINT**

Defendants Citadel Securities LLC; Goldman Sachs & Co., LLC; GTS Securities, LLC; Virtu Americas LLC; Canaccord Genuity LLC; Susquehanna Securities, LLC; Cowen & Company, LLC; Robert W. Baird & Co., Inc.; IMC Chicago, LLC; Latour Trading LLC; G1 Execution Services, LLC; Cantor Fitzgerald & Co.; Two Sigma Securities, LLC; SG Americas Securities, LLC; Morgan Stanley & Co., LLC; J.P. Morgan Securities, LLC; Clear Street LLC; Stifel, Nicolaus & Co., Inc.; Wells Fargo Securities, LLC; William Blair, LLC; UBS Securities, LLC; Keefe, Bruyette & Woods, Inc.; BOFA Securities, Inc.; Maxim Group LLC; KeyBanc Capital Markets, Inc.; StoneX Financial Inc; Puma Capital, LLC; HRT Financial LP; Flow Traders US Institutional Trading, LLC; and Wolverine Trading, LLC (collectively “Market Maker Defendants”),¹ hereby move to dismiss with prejudice the Second Amended Complaint, ECF Doc. No. 133, of Plaintiff Judekenneth Maduka Orji pursuant to Rules 8(a), 9(b), and 12(b)(6) of the Federal Rules of Civil Procedure and Section 21D(b) of the Private Securities Litigation Reform

¹ Plaintiff used incorrect names for several Market Maker Defendants. We use their correct names here.

Act of 1995, 15 U.S.C. § 78u-4(b) (the “Motion”). The grounds supporting the Motion are set forth in the accompanying Memorandum of Law and the Declaration of Cameron S. Matheson.

Dated: August 23, 2024 Respectfully submitted,

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